



Service User Privacy Notice

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'Privacy Notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects and uses the information?

Frontline Fife (the 'Charity') is a 'Data Controller' and gathers and uses certain information about you.

Frontline Fife is a company limited by guarantee registered in Scotland under company number 179304 and is a Registered Scottish Charity under Scottish Charity Number SC021832.

Registered address:

57 - 59 Viewforth Street

Kirkcaldy

Fife

KY1 3DJ

What is personal data/information?

This notice applies in relation to the processing of your personal data. Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified' and is, in effect, any information about you that enables you to be identified. This would include obvious information such as your name and contact details but could include other information like data relating to your circumstances which can be put together to deduce your identity.

Data protection principles

We will comply with the data protection principles when gathering and using personal information.

The Data protection principles are:

1. Processing is lawful, fair and transparent

We have identified and documented our legal basis for processing your data (set out in the below schedules). We use this privacy notice to inform you about the data we process and treat you fairly in relation to the data we process.

2. Purpose limitation

We specify our purposes for processing each category of processing and set these out in the below schedules. We do not (further) process data for reasons out with these purposes.

3. Data minimisation

We only process the minimum data required to fulfil our specified purpose.

4. Accuracy

We do our best to ensure that all the personal data we process in relation to your case is accurate.

5. Storage limitation

We only keep the personal data that we process for as long as we need it. Our retention periods are set out in our data protection policy.

6. Security

We take appropriate technical and organisational measures to ensure that the personal data that we process is stored securely.

7. Accountability

In our capacity as a Data Controller, we are accountable to these data protection principles and can show how we comply with these requirements.

Who we may share data with

The tables below set out on the following pages summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared per service. Generally, we may share data as follows:

The Housing Partnership

As part of our work with you, Frontline Fife work within the Housing Partnership. As such we may make (or receive) referrals to/from these partners and/or work collaboratively with them in providing you with services. Frontline Fife will always seek your consent prior to doing this.

These partners also have routine access to a limited amount of your personal data as specified in the tables below. Please note that these Partners will not access this data prior to receiving your consent to do so. Please contact the Data Controller or speak to your Housing Advisor if you would like a list of these partners.

Public Social Partnership Members

Frontline Fife are a Partner of the Public Social Partnership. As such, depending on your case, we work collaboratively with the following bodies in providing Housing Advice:

- Trust in Fife
- Barony Housing Association
- Bethany Christian Trust
- ENeRGI
- Fife Women's Aid
- Kingdom Support & Care CIC
- Penumbra
- Link Living
- The Richmond Fellowship (Scotland)
- YMCA Glenrothes

These Partners are all subject to a Data Sharing Agreement which each party has agreed and signed up to. As such, this agreement ensures that appropriate data protection measures are taken by each party and that the processing and sharing of data is regulated.

Under this agreement, PSP partners (including Frontline Fife) will seek consent before sharing your data for the purposes of making referrals and providing support.

Sharing with consent with a 3rd party

As well as this sharing, we may also seek your explicit consent to share data with other parties who may be relevant to your support but are not subject to our data sharing agreements. For example, for the purposes of making an onward referral at your request with another organisation such as CAREF, Fife Law Centre, the DWP, Fife Council and Fife Migrants Forum to allow you to access their support or services. Furthermore, we may share data with your consent with 3rd party auditors to assess the quality of service that we provide.

Circumstances where we may be required to share data without your consent

We may also need to share some of the categories of personal information set out below with other parties. There are circumstances where we are required to share this data without your consent. This includes situations where we share data with social work or the emergency services when we believe you or another person is at risk of harm. We may be required to share data with Government agencies such as the Police in other appropriate circumstances such as if we are required to by law to provide data to the police for the prevention or detection of crime. We may also be required to provide data to our professional advisors, regulators and funders. Information may be anonymised depending on the circumstances, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We seek to ensure that our information collection and processing is always proportionate - that is, we only collect and process what we need to, and we only store it for as long as we need to. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Frontline Fife primarily store housing advice data using the FORT CRMS database. Data may be also held securely at our offices and by third-party agencies, service providers, representatives and agents. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

In instances where you provide Frontline Fife with original copies of documents for use in the course of providing you with housing advice and/or lay representation, Frontline Fife will scan copies of these for our use for these purposes and return the original hard copies to you as soon as reasonably practicable.

How long we keep your information

We keep your information for no longer than is necessary; this normally means whilst we are working with you and for a period thereafter the length of which will depend on the nature of the service and support we are providing to you. In most cases, we will not keep your information for more than 5 years after you last contact us.

Your rights

Under the GDPR, you have the following rights, which we will always work to uphold:

1. The right to be informed about the personal data we collect and use about you. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
2. The right to access the personal data we hold about you. This is called making a Subject Access Request.
3. The right to have your personal data rectified if any of your personal data we hold is inaccurate or incomplete.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another organisation or business in certain cases.
8. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about how we use your personal data or to exercise any of your rights as outlined above, please contact our Data Protection Officer using the contact details provided below. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about how we use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them through their website at www.ico.org.uk or can call them on 0303 123 1113.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to staff who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Changes to what we do

We regularly review and, where necessary, update our privacy information, policies, procedures and privacy notices. If we plan to use your personal information for a new purpose, we will update our documentation and privacy notice, and communicate the changes to you before starting to use the information in a new way. Where we have obtained your consent to process your personal data and we wish to change how we process it, we will seek your consent for the new processing. Sometimes we have to change what we do because of a change in the law or we need to change the way we do things as an organisation and have a legitimate interest for doing so.

The latest version of this Privacy Notice will always be available at www.frontlinefife.co.uk.

How to contact us

For information about how we collect, store and process your personal data or for any questions or concerns you might have about data protection please contact our Data Protection Officer at natasha.johnstone@frontlinefife.co.uk or speak to your housing advisor.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at www.ico.org.uk/make-a-complaint/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

1. Frontline Fife Housing Advice:

Who is the Data Controller in relation to this processing?

Frontline Fife are Data Controllers for the purposes of the data we process in providing Housing Advice. This means that we are responsible for data protection matters in relation to information you provide us. If you wish to exercise your data rights or make a complaint about how we use your data, you can contact our Data Protection Officer (using the details above).

| The information we collect | How we collect the information | Why we collect the information and our legal basis for processing | Who we may share the information with |
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| <p><u>Referral data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Name • date of birth • address • phone number • Why advice required • S.11 referrals | <p>We may receive referrals from 3rd parties. Data is shared by these partners with you consent.</p> <p>If you are not referred to us by another party, you may self – refer by contacting our offices and requesting advice. We collect information directly from you from such a referral.</p> | <p><u>Consent (sought by referrer)</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (a) <p>If we receive an external referral, the referrer seeks your consent to share this data with us from you before data is shared.</p> <p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (f) <p>If you phone or email our office to seeking our advice services, our staff will pass on your request to our housing advisors and we do so under our legitimate interest. We also have a legitimate interest to process s.11 referrals sent to us by Fife Council.</p> <p><u>Purpose for processing data:</u></p> | <p>This data is not shared out with Frontline Fife unless you provide your consent otherwise for the purposes of making an onward referral to another agency or for working collaboratively with another agency.</p> |

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| | | We process this data for the purpose of getting in touch with you following a request from you that Frontline Fife provide you Housing Advice/Lay representation | |
| <u>Personal Details</u> Data includes: <ul style="list-style-type: none"> • Name • Address • Contact details • Client ID • NI Number | We collect this information directly from you when you fill out our enquiry form. | <u>Consent</u> <ul style="list-style-type: none"> • GDPR Article 6 (1) (a) <u>Purpose for processing data:</u> We process this data for the purposes of administering the support we provide you. | A number of our partners have access to this data on our systems. However, partners are prohibited from accessing this data unless you have provided explicit consent for the purposes of making a referral to a partner more equipped to deal with your case or for working collaboratively. For a full list of partners with access to this information, please speak to your Housing Advisor or contact our Data Protection Officer. |
| <u>Case Assessment data:</u> Data includes: <ul style="list-style-type: none"> • Ethnic Origin • Employment Status • Income details • Tenancy details • Arrears details • Details of family members • Other issues faced by members of the | We collect this information directly from you when you fill out our enquiry form. We also collect case assessment data during our meetings. This contains sensitive data as follows: <u>Special Category Data</u> Ethnic Origin, Health <u>Criminal Conviction Data</u> | <u>Consent</u> <ul style="list-style-type: none"> • GDPR Article 6 (1) (a) <u>Special Category Data</u> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a) <u>Criminal Conviction data</u> <ul style="list-style-type: none"> • Data Protection Act 2018, Schedule 1, part 3, para.29 consent to process criminal conviction data <u>Purpose for processing data:</u> We process this data for the purposes of assessing your case in order to provide | If we provide you with Lay Representation in the Sheriff Court, we disclose the relevant data required to present your case to the court. We limit the data we disclose to only the data necessary to present your case. |

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| <p>household</p> <ul style="list-style-type: none"> • Other agencies providing support | | <p>appropriate Housing Advice to you and/or Lay Representation</p> | |
| <p><u>Case administration data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Start and end date of service • Court reference number • Case defence details • Date of court appearance • Outcome • Date of next court appearance • Emergency contact data | <p>We collect this data directly from you as well as Court Rolls. We also note data from advisors such as the defence provided/advice given</p> <p>Some of this data is public information as it is publicised in the Court Rolls</p> | <p><u>Consent</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (a) <p><u>Performance of a contract</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (b) <p><u>Purpose of the processing:</u></p> <p>We process this data for the purposes of administering advice/representation we provide.</p> | <p>Data in relation to court and case information is public information publicised in court rolls.</p> <p>Data not made public in this way is not shared out with Frontline Fife unless you provide your consent otherwise for the purposes of making an onward referral to, or otherwise collaborating with another agency.</p> |
| <p><u>Case Note Data</u></p> <p>Data Includes:</p> <ul style="list-style-type: none"> • Contact made with you (letters, records if phone calls and meetings) | <p>We record data regarding contact with you and third parties. We also records information you provide us that may be relevant to your case.</p> <p><u>Special category data</u> Ethnic origin, health, sexual orientation, religion (if relevant to case)</p> | <p><u>Consent</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (a) <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a) <p><u>Criminal Conviction data</u></p> | <p>This data is not shared out with Frontline Fife.</p> |

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| <ul style="list-style-type: none"> Records of failed contact Comments of Frontline Fife workers Contact with 3rd parties Records of Consents Other data collected during meetings or discussions which is relevant to your case | <p><u>Criminal Conviction Data</u> (if relevant to case)</p> | <ul style="list-style-type: none"> Data Protection Act 2018, Schedule 1, part 3, para.29 consent to process criminal conviction data <p><u>Legitimate Interest</u></p> <ul style="list-style-type: none"> GDPR Article 6(1)(f) <p>We have a legitimate interest to process the professional details of people working in collaboration with the service user.</p> <p><u>Purpose of the processing:</u></p> <p>We process this data for the purposes of administering the advice/representation we provide.</p> | |
| <p><u>Data sought from 3rd parties relevant to your case</u></p> <p>Data includes:</p> <p>Any relevant data according to the needs of your case as agreed between you and your advisor.</p> | <p>We obtain data from 3rd parties for the purposes of gathering information to further assess your case and allow us to provide appropriate advice or representation.</p> | <p><u>Consent</u></p> <ul style="list-style-type: none"> GDPR Article 6 (1) (a) <p><u>Purpose of the processing:</u></p> <p>We process this data for the purposes of assessing your case and for providing competent advice and lay representation.</p> | <p>We may seek your consent to share this information if we wish to make an onward referral or work collaboratively with another agency.</p> <p>We will seek your explicit and specific consent before we share your data in this way.</p> |
| <p><u>Contact with Head Office</u></p> <p>Data includes:</p> | <p>We collect this data when you make a call to one of our offices, send us a letter or a referral is made to us on Fort.</p> | <p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> GDPR Article 6(1)(f) | <p>This data is not shared out with Frontline Fife</p> |

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| <ul style="list-style-type: none"> • Records of calls you make to Frontline Fife • Records of letters sent to you • Records of letters received from you • Records of Fort Referrals | | <p>We have a legitimate interest to process data in relation to contact you may make with head office in order to allow us to administer the service we provide</p> <p><u>Purpose of the processing:</u></p> <p>We process this data order to aid in administering the service we provide.</p> | |
| <p><u>Complaints about Frontline Fife</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Contact details • summary of the complaint being made | <p>We collect this data when the service user submits a complaint to us about the service we provide. We may anonymise your complaint and use it for training purposes for Frontline Fife staff.</p> | <p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> • GDPR Article 6 (1) (f) <p>We have a legitimate interest to process complaints data, so we are able to respond to the concerns that you raise and take appropriate action</p> <p><u>Purpose of the processing:</u></p> <p>We process this data in order to receive, administer and take action in relation to complaints made by service users in relation to Frontline Fife services.</p> | <p>This data is not shared out with Frontline Fife</p> |